

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

STATE OF NEW MEXICO, ex rel. HECTOR H.
BALDERAS, Attorney General, and STATE OF
MISSISSIPPI, ex rel. JIM HOOD, Attorney General,

Defendants.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

Adv. No. 22-1231 (MBK)

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON SEPTEMBER 14, 2022 AT 10:00 A.M.**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Parties are directed to <https://www.njb.uscourts.gov/LTL> for appearing via in-person or zoom

MATTERS NOT GOING FORWARD IN THE BASE CASE

1. Motion of the Official Committee of Talc Claimants to Terminate the Debtor's Exclusive Period Pursuant to 11 U.S.C. § 1121(d)(1) [Dkt. 2721].

Status: Pursuant to the *Order Adjourning Exclusivity Motions and Extending Debtor's Exclusivity Periods* [Dkt. 2870], this matter has been adjourned to the November 16, 2022 hearing.

2. Debtor's Motion for an Order Authorizing Establishment of a Qualified Settlement Fund for Payment of Talc Claims [Dkt. 8] (the "QSF Motion").

Status: Pursuant to the *Determination of Adjournment Request* [Dkt. 2860], this matter has been adjourned to the November 16, 2022 hearing.

3. Debtor's Motion for an Order (A) Authorizing the Filing Under Seal of Certain Confidential Commercial Information in Connection with the QSF Motion and (B) if Necessary, In Camera Hearing [Dkt. 9].

Status: Pursuant to the *Determination of Adjournment Request* [Dkt. 2860], this matter has been adjourned to the November 16, 2022 hearing.

MATTERS GOING FORWARD IN THE ADVERSARY PROCEEDING

4. Debtor's Motion for an Order (I) Preliminarily Enjoining the Prosecution of the New Mexico and Mississippi State Actions and (II) Granting a Temporary Restraining Order Pending a Further Hearing [Adv. Pro. Dkt. 2] (the "PI Motion").

Status: This matter is going forward.

Objection Deadline: August 12, 2022

Related Documents:

- A. Debtor's Verified Complaint for Injunctive Relief (I) Preliminarily Enjoining the Prosecution of the New Mexico and Mississippi State Actions and (II) Granting a Temporary Restraining Order Pending a Final Hearing [Adv. Pro. Dkt. 1].
- B. Proposed Preliminary Injunction Order [Adv. Pro. Dkt. 3].
- C. Proposed Temporary Restraining Order [Adv. Pro. Dkt. 4].
- D. Declaration of John K. Kim in Support of Debtor's Verified Complaint for Injunctive Relief and Related Motion With Respect to the New Mexico and Mississippi State Actions [Adv. Pro. Dkt. 5].

- E. Application to Shorten Time [Adv. Pro. Dkt. 6].
- F. Order Granting Application to Shorten Time [Adv. Pro. Dkt. 7].
- G. Summons Issued for Service [Adv. Pro. Dkt. 8].
- H. Consent Order Regarding (I) Briefing Schedule for Debtor's Motion for an Order Preliminarily Enjoining the Prosecution of the New Mexico and Mississippi State Actions, (II) Agreed Stay of Such Actions and (III) Extension of the Time for Defendants to Respond to the Complaint [Adv. Pro. Dkt. 15].
- I. Debtor's Reply in Support of PI Motion [Adv. Pro. Dkt. 24].
- J. Debtor's August 22, 2022 Letter to the Court [Adv. Pro. Dkt. 26].
- K. States of New Mexico and Mississippi August 22, 2022 Letter to the Court [Adv. Pro. Dkt. 27].

Objections Received:

- L. The States' Opposition to Debtor's Motion for Injunctive Relief [Adv. Pro. Dkt. 18] (the "States' Opposition").
- M. Declaration of Robert K. Malone Pursuant to 28 U.S.C. § 1746 in Support of the States' Opposition [Adv. Pro. Dkt. 19].
- N. Objection of the Ad Hoc Committee of States Holding Consumer Protection Claims to the PI Motion [Adv. Pro. Dkt. 21].
- O. Statement of the Official Committee of Talc Claimants in Support of the States' Opposition [Adv. Pro. Dkt. 22] (the "TCC Statement").
- P. Maune Raichle Hartley French & Mudd, LLC's Joinder to the TCC Statement and the States' Opposition [Adv. Pro. Dkt. 23].

MATTER GOING FORWARD IN THE BASE CASE

- 5. Debtor's September 7, 2022 Letter to the Court Regarding the Scope of the *Order Granting Limited Relief From the Automatic Stay* [Dkt. 2973] (the "Debtor's Letter").

Related Documents:

- A. Order Granting Limited Relief From the Automatic Stay [Dkt. 2836].
- B. Anthony Hernandez Valadez's Response to the Debtor's Letter [Dkt. 2979].

Status: This matter is going forward with permission of the Court.

INTERIM FEE APPLICATIONS GOING FORWARD

The following applications for compensation and reimbursement of expenses are going forward. Numbers 1, 13-20, 22, and 26-31 are going forward on an uncontested basis and numbers 2-12, 21, and 23-25 are subject to the *Debtor's Statement Regarding Second Interim Fee Applications Filed by Professionals for the Official Committee of Talc Claimants I and the Official Committee of Talc Claimants II and Objection to Fees and Expenses Associated with Committee Website* [Dkt. 2888] (the "Debtor's Statement and Objection"):

1. Orrick, Herrington & Sutcliffe LLP [Dkts. 2560, 2561].

Objection Deadline: September 6, 2022

Related Documents:

- A. Fee Examiner's Consolidated Final Report Pertaining to the Interim Fee Applications of Retained Professionals for the Period From February 1, 2022 Through May 31, 2022 [Dkt. 2958] (the "Fee Examiner Final Report").

2. Genova Burns LLC [Dkt. 2577].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
- B. The Debtor's Statement and Objection.
- C. Maune Raichle Hartley French & Mudd, LLC's Response to Johnson & Johnson's Statements and Objections Regarding Fee Applications [Dkt. 2968] (the "MRHFM Response").

3. Sherman, Silverstein, Kohl, Rose & Podolsky, P.A. [Dkt. 2578].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
- B. The Debtor's Statement and Objection.
- C. The MRHFM Response.

4. Brown Rudnick LLP [Dkt. 2579].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
5. Waldrep Wall Babcock & Bailey PLLC [Dkt. 2580].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
6. Bailey & Glasser LLP [Dkt. 2581].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
7. Massey & Gail LLP [Dkt. 2582].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
8. FTI Consulting, Inc. [Dkt. 2583].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
9. MoloLamken LLP [Dkt. 2584].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
10. Miller Thomson LLP [Dkts. 2233, 2586].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
11. Otterbourg P.C. [Dkt. 2588].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
12. Parkins Lee & Rubio LLP [Dkt. 2589].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
- B. The Debtor's Statement and Objection.
- C. The MRHFM Response.

13. King & Spalding LLP [Dkt. 2595].

Objection Deadline: September 7, 2022

Related Documents:

- A. The Fee Examiner Final Report.

14. Wollmuth Maher & Deutsch LLP [Dkt. 2596].

Objection Deadline: September 7, 2022

Related Documents:

- A. The Fee Examiner Final Report.

15. Bates White, LLC [Dkt. 2597].

Objection Deadline: September 7, 2022

Related Documents:

- A. The Fee Examiner Final Report.

16. McCarter & English, LLP [Dkt. 2598].

Objection Deadline: September 7, 2022

Related Documents:

- A. The Fee Examiner Final Report.

17. AlixPartners, LLP [Dkt. 2599].

Objection Deadline: September 7, 2022

Related Documents:

- A. The Fee Examiner Final Report.

18. Blake, Cassells & Graydon LLP [Dkt. 2600].

Objection Deadline: September 7, 2022

Related Documents:

- A. The Fee Examiner Final Report.

19. Weil, Gotshal & Manges LLP [Dkt. 2601].

Objection Deadline: September 7, 2022

Related Documents:

- A. The Fee Examiner Final Report.

20. Skadden, Arps, Slate, Meagher & Flom LLP [Dkt. 2602].

Objection Deadline: September 7, 2022

Related Documents:

- A. The Fee Examiner Final Report.

21. Cooley LLP [Dkts. 1767, 2603].

Objection Deadline: September 8, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
- B. The Debtor's Statement and Objection.
- C. The MRHFM Response.
- D. Debtor's Objection to the Final Application for Allowance of Fees and Reimbursement of Expenses for the Period of December 31, 2021 Through April 12, 2022 Filed by Cooler, LLP, Co-Counsel for the Official Committee of Talc Claimants II [Dkt. 2952].
- E. Notice of Withdrawal of Request for Reimbursement of Expenses Incurred by Certain TCC II Committee Members [Dkt. 2998].

22. Jones Day [Dkts. 2360, 2604].

Objection Deadline: September 7, 2022

Related Documents:

- A. The Fee Examiner Final Report.
23. Anderson Kill PC [Dkt. 2623].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
24. Houlihan Lokey Capital, Inc. [Dkt. 2667].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
25. The Brattle Group [Dkt. 2668].

Objection Deadline: September 7, 2022

Related Documents and Objections:

- A. The Fee Examiner Final Report.
 - B. The Debtor's Statement and Objection.
 - C. The MRHFM Response.
26. Randi S. Ellis [Dkt. 2688].

Objection Deadline: September 7, 2022

Related Documents:

- A. The Fee Examiner Final Report.

27. Walsh Pizzi O'Reilly Falanga LLP [Dkt. 2690].

Objection Deadline: September 7, 2022

Related Documents:

A. The Fee Examiner Final Report.

28. Womble Bond Dickinson (US) LLP [Dkt. 2718].

Objection Deadline: September 7, 2022

Related Documents:

A. The Fee Examiner Final Report.

29. Taurig Law LLC [Dkt. 2732].

Objection Deadline: September 7, 2022

Related Documents: None.

30. Robert J. Keach, Esq. [Dkt. 2733].

Objection Deadline: September 7, 2022

Related Documents: None.

31. Bernstein, Shur, Sawyer & Nelson, P.A. [Dkt. 2734].

Objection Deadline: September 7, 2022

Related Documents: None.

Dated: September 12, 2022

WOLLMUTH MAHER & DEUTSCH LLP

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